

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

CHARLES LANGONE, as FUND MANAGER)
of the NEW ENGLAND TEAMSTERS AND)
TRUCKING INDUSTRY PENSION FUND)

Plaintiff,)

v.)

LINDEN MOTOR FREIGHT CO., INC.)

Defendant,)

C.A. No.04cv11734 RGS

AFFIDAVIT OF CATHERINE M. CAMPBELL IN SUPPORT
OF AWARD OF ATTORNEY'S FEES AND COSTS PURSUANT TO
SECTION 502(g)(2) OF ERISA, 29 U.S.C. § 1132(g)(2)

Catherine M. Campbell deposes and says as follows:

1. I am an attorney with the law office of Feinberg, Campbell & Zack, PC, located at 177 Milk Street, Boston, MA 02109. I am admitted to practice before the United States District Court for the District of Massachusetts, the United States Court of Appeals for the First Circuit, the United States District Court for the Northern District of California, the Massachusetts Supreme Judicial Court, and the California Supreme Court. I specialize in litigation under the Employee Retirement Income Security Act of 1974 (ERISA) and the Multiemployer Pension Plan Amendments Act of 1980 (MPPAA). I have acted as legal representative of the New England Teamsters and Trucking Industry Pension Fund ("Pension") for the purposes of the above-captioned matter.

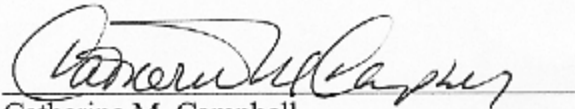
2. The amount of time this office has expended in pursuing collection of withdrawal liability due and owing the Pension Fund from the Defendant Linden Motor Freight Co., Inc. has been 6.0 hours. (See attached documentation.)

3. Pursuant to financial arrangements made by this office with the Fund, services performed by an attorney in this office for the Fund are charged at the rate of \$235.00. Accordingly, the amount of legal fees incurred by the Pension Fund as a result of the work performed by this office is \$1,323.75 (See attached documentation).

4. Costs incurred by the Fund in pursuing this action are \$150.00 (See attached documentation.)

5. The total attorneys' fees and costs incurred by the Pension Fund are \$1,473.75.

SIGNED UNDER THE PAINS AND PENALTIES OF PERJURY THIS 5th DAY OF JANUARY 2004.



Catherine M. Campbell

BBO #549397

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Client Name: New England Teamsters & Trucking Industry Fund
 Client ID: 200.347

<i>Transaction Date</i>	<i>Rate</i>	<i>Hours to Bill</i>	<i>Amount</i>	<i>Description</i>
7/29/04	\$125.00	0.25	\$31.25	Prepare Complaint, civil action cover sheet, and category sheet
8/5/04	\$235.00	1.50	\$352.50	Preparation of Complaint; Correspondence to Atty. New; Preparation of Acceptance of Service form
12/23/04	\$235.00	0.75	\$176.25	Preparation of Motion for Default
12/29/04	\$235.00	3.25	\$763.75	Preparation of Motion for Default
TOTAL FEES			\$1,323.75	
TOTAL COSTS			\$ 150.00	Filing Fee
TOTAL BALANCE			\$1,473.75	